

The Wolf Law Firm, LLC  
1520 U.S. Hwy 130 – Suite 101  
North Brunswick, NJ 08902  
Tel: (732) 545-7900  
Fax: (732) 545-1030

Philip D. Stern, Esq.  
Philip D. Stern & Associates, LLC  
Attorneys at Law  
697 Valley Street, Suite 2d  
Maplewood, NJ 07040  
(973) 379-7500

*Attorneys for Plaintiff and the putative class*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
NEWARK VICINAGE**

THOMAS C. WILLIAMS, on behalf of  
himself and those similarly situated,

Plaintiff,

vs.

THE CBE GROUP, INC.,

Defendant.

Civil Action No. **2:11-cv-3680-PS**

**DECLARATION OF  
ANDREW R. WOLF, ESQ.**

Andrew R. Wolf, Esq., of full age, by way of Declaration in lieu of Affidavit, states:

1. I am an Attorney at Law of the State of New Jersey, and the sole member of the Wolf Law Firm, LLC with offices located at 1520 U.S. Highway 130, Suite 101, North Brunswick, New Jersey.

2. My firm, along with the Philip D. Stern and Associates, represents Plaintiff on behalf of himself and all others similarly situated in this matter. I have personal knowledge of the facts stated herein.

3. I make this Certification in support of preliminary approval of the class action settlement including certifying a Fed. R. Civ. P. 23(b)(3) settlement class, appointing Plaintiff's

counsel as class counsel, appointing Plaintiff as the class representative and scheduling a Fairness Hearing.

4. Based on the claims alleged in this matter, we believe that certification of a Fed. R. Civ. P. 23(b)(3) class and the proposed settlement is appropriate.

5. I have been personally involved in this matter, including the investigation of claims, drafting, reviewing and editing of pleadings and briefs, legal research, settlement negotiations and many other aspects of the litigation. I am experienced in handling complex litigation such as this, and I have been certified as class counsel in 53 other matters.

6. Plaintiff filed this action on June 24, 2011. Defendant filed an answer on August 8, 2011. Defendant subsequently moved for judgment on the pleadings, and the Court denied the motion in an order and opinion filed December 22, 2011. The parties thereafter began settlement negotiations and reached a settlement as to all issues other than attorneys' fees. Subsequently, the parties negotiated and agreed upon an amount for attorneys' fees. The final settlement agreement was signed on February 23, 2012.

7. A copy of the Class Action Settlement Agreement is attached as **Exhibit A**. A copy of the proposed form of Notice, which was modeled on the template notices created by the Federal Judicial Center, is attached as **Exhibit B**.

8. Based on my experience, I believe that the settlement is fair, reasonable and adequate, particularly in a case alleging only statutory damages under the FDCPA.

9. My firm and the attorneys involved in this matter are experienced in cases involving complex litigation issues concerning consumer protection statutes—including the Fair Debt Collection Practices Act (FDCPA), regulations and violations thereof, and the complex issues related to litigating putative class action cases. I have personally been certified as class counsel in 59 cases, more than twelve of which were class actions involving violations of the FDCPA. A list of the cases where I have been certified as class counsel is attached as **Exhibit C**.

10. The law firms and attorneys involved in this matter are also experienced with the complex issues of obtaining class certification, obtaining and verifying information related to class members, supervising and monitoring the provision of Notice to class members. The law firms and attorneys involved in this matter are also experienced in negotiating complex class action settlements, obtaining court approval of class action settlements and implementing,

monitoring and supervising the class action settlements after preliminary approval and after final approval of class action settlements. Mr. Wolfe, Mr. Gardner, Mr. Ricci and I are members of the National Association of Consumer Advocates and have concentrated our practices in the area of consumer law. A copy of the profiles of the attorneys in my firm from our website is attached as **Exhibit D**.

11. My firm has devoted all resources necessary to litigate this case to date and will continue to commit the time and resources necessary until the case is finally resolved. My office has more than adequate resources to prosecute this case, including several attorneys, sufficient support staff experienced in communicating with class members, multiple telephone lines for handling communications or questions from class members, and a record of successfully completed class actions.

12. My firm intends to vigorously represent the interests of the putative class. We are not aware of any possible conflicts of interest between Plaintiff and their counsel or the putative class.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

s/Andrew R. Wolf  
**ANDREW R. WOLF, ESQ.**

Dated: March 1, 2012